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Of Attorneys for Defendant Michael James DeFrees

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL JAMES DEFREES,

Defendant.

Case No. 3:22-CR-00184-SI

**DECLARATION OF BRIDGET M.
DONEGAN IN SUPPORT OF
DEFENDANT'S UNOPPOSED
MOTION FOR CONTINUANCE
OF TRIAL DATE**

I, BRIDGET M. DONEGAN, hereby declare and say:

1. I have been retained to represent defendant Michael James DeFrees.
2. Mr. DeFrees is out on pretrial release and in good contact with his attorneys.
3. Mr. DeFrees is charged via indictment with two counts of Wire Fraud, in violation of 18 U.S.C. §1343, one count of Bank Fraud, in violation of 18 U.S.C. §1344, and one count of Money Laundering, in violation of 18 U.S.C. §1957.

4. Trial is currently scheduled for December 20, 2022.

5. Counsel is continuing to receive and review discovery from the government.

Additional time is necessary to complete the discovery process, investigate the case, and prepare for plea negotiations and/or trial.

6. Counsel has spoken with Mr. DeFrees and Mr. DeFrees authorized counsel to waive his statutory and Constitutional speedy trial rights for this Court to grant the motion to continue so that counsel could complete the necessary work on his behalf.

7. Assistant United States Attorney Ryan Bounds has advised that the government has no objection to the allowance of this motion.

I hereby declare under penalty of perjury that the above statements are true to the best of my knowledge and belief.

DATED this 8th day of December, 2022.

s/ Bridget M. Donegan
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Of Attorneys for Defendant Michael James DeFrees

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF BRIDGET M. DONEGAN IN SUPPORT OF DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL DATE on the following attorney by electronic case filing a full and correct copy thereof on the 8th of December, 2022.

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s/ Bridget M. Donegan
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